On behalf of Hands On Video Relay Services, Inc. this will supplement its annual waiver report pursuant to staff request on the subject of emergency call routing.

Incorporated by reference is Hands On's December 1, 2004 supplement to waiver report. In addition to the information contained in that supplement we provide the following information.

As of this time, Hands On knows of no way to automatically obtain location information on a VRS caller. Even if Hands On could capture and read the IP address of the VRS caller, many VRS callers have dynamic IP addresses. GPS technology could solve the problem of providing routing information. That is, if GPS receivers were built into video phones or computers used for VRS. Then a software program could be devised to transmit location information to the VRS service provider and that information could be integrated with the PSAP database and automatic routing achieved giving GPS coordinate location data, which would still need to be translated to street addresses.

There are problems with this approach. First, VRS providers generally have no control over the equipment used for VRS service, although some providers provide video phones for their customers. Thus providers would have difficulty requiring consumers to have a GPS. Second, any computer can be configured for VRS in a short amount of time. It is unlikely from a policy standpoint that the Commission would be willing to mandate that all computers be equipped with GPS receivers, assuming the Commission has that authority. Cost would certainly be a factor as well. Millions of computers are sold yearly in the United States. The cost of adding GPS receivers to them all would be several hundred million dollars. Adding a GPS receiver would add a sizable cost to video phones as well. Third, adding a GPS to a computer and integrating it with VRS would likely require on site installation, which the Commission has held is not a reasonable cost of VRS. Fourth, privacy concerns might prompt customers to remove the GPS once it was installed.

Beyond that, are cost considerations in integrating VRS with the PSAP database. Current technology would likely allow such an integration with sufficient research and development of operational software. However, the Commission has held that the cost of complying with waived standards is not a reasonable VRS cost. Until the Commission reverses that position, it should not expect VRS providers to expend sums on research and development to meet waived standards.